



# Montana Stockgrowers Association

Serving Montana's Cattle Industry Since 1884

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GRIZZLY BEAR RECOVERY  
COORDINATORS OFFICE.

DEC 01 1997

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December 1, 1997

The Grizzly Bear Coordinator  
US Fish and Wildlife Service  
P.O. Box 5127  
Missoula, MT 59806

RE: Grizzly Bear Recovery in the Bitterroot Ecosystem  
Draft Environmental Impact Statement, July 1997

Dear Sir:

On behalf of the 3800 members of the Montana Stockgrowers Association, I respectfully submit the comments outlined in the body of this letter. Our involvement, and that of many of the residents of the Bitterroot Valley, in the above noted grizzly bear recovery proposal has the potential to be significant, depending on which portion of the Bitterroot ecosystem the grizzly bears decide to use as their main habitat. From the information contained within the draft EIS, it appears a significant portion of the better grizzly bear habitat exists east of the Idaho/Montana border on the Bitterroot National Forest. The close proximity of this area to the private lands, and high human use areas in the western portion of the Bitterroot Valley, and the lack of development of this issue within the EIS is the main source of our concern. We are adamantly opposed to the reintroduction of grizzly bears into the Bitterroot Selway Wilderness, and respectfully request this proposal be withdrawn until the full range of adverse effects are further developed.

We feel this proposal to reintroduce grizzly bears has not been adequately developed, and analyzed. It is our belief that adequate scientific understanding of the behavior of bears and their ecological, physical, and reproductive needs must be better understood in order to accurately predict the true impacts associated with this reintroduction proposal. A background report published by the British Columbia Ministry of Environment, Lands, and Parks entitled "Conservation of Grizzly Bears in British Columbia" clearly raises the issue of the completeness of our understanding of grizzly bear population dynamics, and states that more research on grizzly bears, their habitat requirements, ecosystems, genetics, and populations characteristics is required. This from an agency that administers ten times more bears and hundreds of times more acres of bear habitat than we have in Montana.

1

Do we really believe we have enough information to predict the recoverability of a distinct grizzly bear population, or accurately predict potential positive or negative impacts from this action?

Thus far the only secure reason for this proposal is that the B/S Wilderness represents the largest block of wilderness lands in the lower 48 states, which is simply not enough justification to carry out this reintroduction program.

This document contains questionable data, presumptions, inconclusive statements, and a general lack of scientific based conclusions. Statements within much of the text clearly indicate this:

..evaluations of this possibility are continuing

..there is no real way to determine or predict

..some undetermined level of mortality is expected

..the specific number of bears that could be obtained is unknown at this time

..predictions are statistical, and are not intended to show exact depredations

..however, by the time bears are recovered in the BE conflicts should be greatly reduced because more would be known.

These statements clearly indicate we are operating at less than adequate knowledge to make factual, timely and accurate predictions as to the ramifications of implementing this program at this time.

2

This proposal will see grizzly bears placed in back yard of the fastest growing community in the State, commonly referred to as Montana's Banana Belt. The Montana Census Bureau of the Department of Commerce shows that the population of the Bitterroot Valley (Ravalli County) has increased 34.3% over the past five years, and estimates indicate the current population of 34,000 will reach almost 55,000 by the year 2025, another 40% increase. Yet this information is not addressed in this EIS document. The use of sparsely populated county data to dilute population and other demographic data associated with impacts directly related to the most affected county is a clear demonstration of the questionable scientific data used to support this reintroduction program.

3

The questionable population data will also affect the assessment of grizzly bear interactions or conflicts with private property, and again we assert that this issue is also not adequately addressed in the document. The EIS states that during the period of 1986 to 1990 the NCDE averaged 26 incidents per year, and during 1994 and 1995 the YE averaged 118 incidents per year. It then goes on to state that private property incidents involving bears in the BE are estimated to be to be between 0 and 118. Clearly the use of such statistically unreliable data in this manner brings into question the application of other data through out the document. Use of such poor data is the same as saying that wolves will kill between 1 and 28 livestock each time they depredate because that is range we have seen from existing wolf depredations in Montana. Conclusions of this nature clearly shows the USFWS have a very limited understanding of the potential private property conflicts may occur in the BE, and until a clearer distinction can be drawn the program should not be permitted to move forward.

4

The EIS is also severely lacking in documentation of predation rates on ungulates, and livestock. It fails to properly address the complex relationships that exist between bears and other predatory animals like wolves, mountain lions, and black bears. The EIS states: "How predators impact each other and their prey is not very well understood..", so how can the simple assumption that grizzly bears, wolves, mountain lions, and other predators have and do co-exist in other ecosystems be applied in this instance? We know they exist in other ecosystems, the question that must be addressed in this instance is whether or not this ecosystem contains all the required habitat attributes, systems, and qualities as other ecosystems that support this mix of predators. We feel this issue has not been adequately addressed through the EIS, and more study needs to be done. We would also like to point out that the Idaho wolf recovery effort has only been in place in this area for two years, might it not be more advisable to establish the success of that effort before we put grizzly bears into the mix? It seems the USFWS is embroiled in a competition between the wolf biologists and the bear biologists to see who can lay claim to the largest portion of the Bitterroot/Selway Wilderness the fastest. Speed here should not be the issue, effective spending of wildlife conservation dollars should be. Ask one simple question: Is the USFWS doing everything it can do in other areas to facilitate, enhance and further the recovery of existing populations?

5

The EIS claims that a grizzly bear habitat assessment, (Craighead criteria, 1982) will be more than adequate to support a recovered population, and that the BE is an ecologically superior area to recover a bear population. But later in the document it states that historic salmon fisheries have been greatly reduced, white bark pine production is only 20% to 40% of historic levels, and only 60% to 80% of the traditional grizzly bear food sources occur in the BE recovery area. These figures do not seem to support the argument that this region is ecologically superior, or that the traditional food sources that transplanted bears may be accustomed to will be available in the recovery area.

Even the Bitterroot National Forest Supervisor has come out in opposition to the recovery of a grizzly bear population in this region, sighting adverse impacts to existing forest management goals and directives through increased complications for recreational users, livestock permittees and a general erosion of the working relationship between the forest service and residents of the Bitterroot Valley. Early this past fall our organization felt the brunt of grizzly bear management impacts on USFS personnel in the Yellowstone Ecosystem. We attempted to include several USFS resource professionals on a grazing management tour, but we were told they were all involved in back country grizzly bear management inspections on outfitter and other recreational user campsites, and would not be available to participate in our resource management tour. Perhaps the Bitterroot Forest Supervisor knows exactly what impacts this recovery plan will have on his ability to manage staff and programs on within the Bitterroot National Forest.

6

Plain and simple, we do not know enough about bears physiological or habitat requirements, their responses to relocation, or their ability to survive in the BE. We have successfully transplanted non-problem bears in the past bears, but we only moved four of them, and only three of the four survived past the first year. The EIS brings this issue to light in saying that successful trapping

- 6 | may not occur, let alone trapping the right sex, age, and types of bears required. We have not even obtained agreement from the Canadians indicating they are willing to provide us with bears.
- 7 | Given the current mortality limits in the YE and the NCDE, we are not sure we can safely provide these bears locally, without adversely impacting recovery efforts in these areas, and inflicting further set backs in grizzly bear recovery and delisting efforts. Also recent studies by Montana DFWP researchers indicate that grizzly bears are not well suited to recovery in areas that include valleys with high human populations or use levels (the Swan Valley), similar to the Bitterroot , but with much less population and much slower growth rates. Why put bears in areas that they know they are going to be in constant conflict with development and other land use issues? It just makes no sense to pursue this recovery plan at this time.
- 8 | This whole grizzly bear reintroduction program is littered with questions and unresolved issues that should be adequately addressed prior to moving ahead. It is estimated the program will cost approximately \$400,000 per year and take close to 25 years to complete. That is a \$10 million roll of the dice being passed to the American taxpayers, shouldn't we make sure we calculate the odds for success or failure as best we can before we start. This effort, while emotionally supported by a vocal minority has some serious scientific short comings that need to be addressed, before we move ahead with the plan.

Thank you for providing us the opportunity to comment on this proposal. If you have questions on any of our comments please call us at (406) 442-3420.

Sincerely,



Jason Campbell  
Natural Resources Coordinator